(47)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE – SUITE 100
BOSTON, MASSACHUSETTS 02109-3012

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

April 22, 2011

Michael Gwyther, Station Superintendent
First Light Power Resources
Mount Tom Station
200 North Hampton Street
Holyoke, MA 01040

Re: Modification to EPA Information Request Letter, Dated February 15, 2011, for NPDES Permit Reissuance, NPDES Permit No: MA0005339

Dear Mr. Gwyther:

The New England Regional Office of the United States Environmental Protection Agency (EPA or Agency) is developing a draft National Pollutant Discharge Elimination System (NPDES) Permit (No. MA0005339) for FirstLight Power Resources Services, LLC's (FirstLight or the Company) Mount Tom Electric Generating Station, Holyoke, MA (MTS or Station). In support of this work, EPA sent FirstLight an information request letter, dated February 15, 2011 (EPA February 308 Letter), pursuant to Section 308(a) of the Clean Water Act (CWA), 33 U.S.C. §1318(a).

After receiving the EPA February 308 Letter, FirstLight contacted EPA and proposed a small number of minor modifications to the EPA information request. A conference call discussion took place between representatives of EPA and FirstLight on March 2, 2011, resulting in a Request for Minor Modification Letter that was sent by FirstLight to EPA, dated March 8, 2011. In addition, a March 30, 2011, e-mail was sent to EPA by Kleinschmidt Associates, representing FirstLight. Based on that information, EPA is amending the EPA February 308 Letter only in the parts provided below:

Information Request

I. Thermal Discharge Information Request

a. The request for information specified in this part has been satisfied. No further information is required under Part I (a).

i. Evaluate the reduction in entrainment of Connecticut River ichthyoplankton by using cylindrical wedge wire screen intakes with a mesh size of 0.5 mm. Discuss mortality estimates of ichthyoplankton that become trapped on the wedge wire screen. Determine the size and number of cylinders necessary to be able to use cylindrical screens of this slot size and evaluate the feasibility of installing and operating these units as well as the impacts associated with their placement and operation. Also include all costs.

III. Deliverable Schedule

a. The request specified in Part I.a. of this letter has been satisfied. No submittal is required.

b. Monthly progress reports are no longer required.

c. Submit all information requested in Parts I.b., I.c. and I.d. on May 31, 2011.

d. Submit the information requested in Part II. of this letter on May 31, 2011.

FirstLight must comply with all parts of the original information request letter (EPA February 308 Letter) that are not listed and clearly modified in this letter. Attachment I of the EPA February 308 Letter remains unchanged.

FirstLight may assert a business confidentiality claim with respect to part or all of the information submitted to EPA in the manner described at 40 CFR Part 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means, of the procedures set forth in 40 CFR Part 2, Subpart B. If no such claim accompanies the information when it is submitted to EPA, it may be made available to the public by EPA without further notice to FirstLight. Please note that effluent information may not be regarded as confidential.

Contact John Nagle of my staff (617) 918-1054 if you have questions regarding this request. The EPA looks forward to working with you on your new permit.

Sincerely,

Stephen S. Perkins, Director
Office of Ecosystem Protection

cc: Gerry Szal, MassDEP
David Webster, EPA
Julie Crocker, NMFS Protected Resources Division

ATTACHMENT A

Modification to EPA Information Request Letter, Dated February 15, 2011, for NPDES Permit Reissuance, NPDES Permit No: MA0005339

Mount Tom Station Thermal Plume Scenarios

Run Scenario	Discharge delta-T (deg F)	Pump Flow (MGD)	River Flow (cfs)	Ambient Water Temp (deg F)
1	13	70	3,000	77
2	13	70	3,000	83
3	13	70	15,000	77
4	13	70	15,000	83
5	13	140	3,000	77
6	13	140	3,000	83
7	13	140	15,000	77
8	13	140	15,000	83
9	26	70	3,000	77
10	26	70	3,000	83
11	26	70	15,000	77
12	26	70	15,000	83
13	26	140	3,000	77
14	26	140	3,000	83
15	26	140	15,000	77
16	26	140	15,000	83